

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,  
Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE  
COMPANY,  
Defendant.

Case No. 2:24-cv-00093-JRG  
(Lead Case)

**JURY TRIAL DEMANDED**

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff VirtaMove Corp. (“VirtaMove”) and Defendant Hewlett Packard Enterprise Company (“Defendant”) (together, “the Parties”) file this Joint Motion to Stay All Deadlines and Notice of Settlement to notify the Court that the Parties have reached a settlement in principle as to all matters in controversy between them. As such, the Parties respectfully request that all remaining case deadlines be stayed for thirty (30) days while the Parties finalize a settlement agreement and file dismissal papers with the Court. It is in the interest of judicial economy to grant this Joint Motion.

For the foregoing reasons and good cause shown, the Parties respectfully request the Court enter an order staying all remaining case deadlines for thirty (30) days.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on June 16, 2025.

Jennifer H. Doan  
Jennifer H. Doan

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

Jennifer H. Doan  
Jennifer H. Doan